

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

SINGULAR COMPUTING LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 1:19-cv-12551-FDS

Hon. F. Dennis Saylor IV

**DECLARATION OF BRIAN SEEVE  
IN SUPPORT OF PLAINTIFF’S OPPOSITION TO  
GOOGLE’S MOTION TO EXCLUDE CERTAIN EXPERT  
TESTIMONY OF DR. SUNIL KHATRI, Ph.D.**

I, Brian Seeve, hereby declare as follows:

1. I am an attorney with the law firm Prince Lobel Tye LLP, attorneys for plaintiff, Singular Computing LLC (“Singular”), in this action. I submit this declaration in support of Singular’s opposition to the motion to of defendant, Google LLC (“Google”), for summary judgment that the asserted patent claims are patent ineligible.

2. Attached hereto as Exhibit A is a true and correct copy of the Expert Report of Dr. Sunil Khatri, Ph.D. dated December 22, 2022.

3. Attached hereto as Exhibit B is a true and correct copy of excerpts from the Rebuttal Expert Report of Martin Walker, Ph.D. dated March 3, 2023.

4. Attached hereto as Exhibit C is a true and correct copy of excerpts from the Deposition of Dr. Sunil Khatri, Ph.D. dated March 23, 2023.

Executed at Boston, Massachusetts on May 19, 2023.

/s/ Brian Seeve